

# **EXHIBIT 70**

**FILED UNDER SEAL**

1 UNITED STATES DISTRICT COURT  
2 FOR THE SOUTHERN DISTRICT OF NEW YORK

3 GOVERNMENT OF THE UNITED )  
4 STATES VIRGIN ISLANDS )

5 Plaintiff, )

6 vs. )

7 JPMORGAN CHASE BANK, N.A., )

8 Defendant/Third- )  
9 Party Plaintiff. )

10 JPMORGAN CHASE BANK, N.A. )

11 Third-Party )  
12 Plaintiff, )

13 vs. )

14 JAMES EDWARD STALEY, )

15 Third-Party )  
16 Defendant. )

17 SATURDAY, JUNE 10, 2023

18 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

19 \*\*CONFIDENTIAL BSA PORTIONS UNDER SEPARATE COVER\*\*

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21 Videotaped deposition of James E.  
22 Staley, held at the offices of Boies Schiller  
23 Flexner, LLC, 55 Hudson Yards, New York, New  
24 York, commencing at 9:13 a.m. Eastern, on the  
25 above date, before Carrie A. Campbell,  
Registered Diplomat Reporter and Certified  
Realtime Reporter.

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1 don't know.

2 Q. Irrespective of your  
3 involvement with his accounts, the fact that  
4 he had his accounts and the size of his  
5 accounts at JPMorgan benefitted JPMorgan.

6 You would agree, right?

7 A. I think no -- you know, I don't  
8 think any single client is that important,  
9 but he was a client of the bank.

10 Q. And he continued to refer  
11 clients to JPMorgan before, during and after  
12 his incarceration, correct?

13 MR. GAIL: Objection.

14 THE WITNESS: I don't think he  
15 referred clients to the bank. I met  
16 clients through him, but I don't think  
17 he was making a referral.

18 QUESTIONS BY MR. EDWARDS:

19 Q. Do you know who Thomas McGraw  
20 is?

21 A. No.

22 Q. Do you remember a Tom McGraw in  
23 the tax department of JPMorgan?

24 A. I don't.

25 Q. Did you ever become aware of